

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SUNFLOWER OPERATING	§	
TRUST,	§	
	§	
VS.	§	Civil Action No. 4:18-cv-01400
	§	
JEFFREY WYMAN, ET. AL.	§	
	§	

**JOINT MOTION FOR APPROVAL OF STIPULATION  
EXTENDING INITIAL RESPONSIVE PLEADING DATE  
FOR DEFENDANT JEFFREY WYMAN**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff, Sunflower Operating Trust (“Sunflower”), and Defendant, Jeffrey Wyman (“Wyman”), in the above-referenced cause of action and file this their Joint Motion for Approval of Stipulation Extending the Initial Responsive Pleading Date for Defendant, Jeffrey Wyman. The parties hereby stipulate to the following:

1. Plaintiff Sunflower Operating Trust filed its Original Complaint on March 30, 2018. The initial pretrial conference is scheduled for June 18, 2018.
2. Defendant Wyman has been served. The date for him to move, answer, or otherwise respond to Plaintiff’s Original Complaint is May 2, 2018.
3. The undersigned counsel for Defendant Wyman was contacted regarding representation in this case on Friday, April 20, 2018. Since that time,

Plaintiff Sunflower and Defendant Wyman have been discussing, and are now negotiating and drafting, an agreement which will dispose of the entire case, if it is consummated. Plaintiff Sunflower and Defendant Wyman are diligently working to finalize the agreement and move for dismissal of the case on or before May 2, 2018, and hope and expect to be able to do so.

4. In the event that they are unable to do so by May 2, 2018, Plaintiff Sunflower and Defendant Wyman have agreed that Defendant Wyman will move, answer, or otherwise respond to Plaintiff's Original Complaint on or before Friday, May 11, 2018, and that Plaintiff Sunflower will not request that the clerk of the court enter a default for Defendant Wyman pursuant to Federal Rule of Civil Procedure 55(a) prior to that date.

5. This stipulation affects no date in any Order entered by this Court.

Plaintiff Sunflower and Defendant Wyman jointly request that the Court approve this stipulation.

DATED: April 27, 2018.

[SIGNATURE BLOCK ON NEXT PAGE]

RESPECTFULLY SUBMITTED,

By: /s/ Terry D. Kernell

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*for Defendant, Jeffrey Wyman*

By: /s/ Christopher B. Lewis

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